

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 1:15-CR-309
:
v. : (Chief Judge Conner)
:
JALIL IBN AMEER AZIZ, :
Defendant. :

S U P E R S E D I N G I N D I C T M E N T

THE GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy to Provide Material
Support and Resources to a Designated FTO)

From on or about July 2014 to on or about December 17, 2015, in
Dauphin County, within the Middle District of Pennsylvania, the
Defendant,

JALIL IBN AMEER AZIZ,

did knowingly conspire to provide material support and resources,
including personnel and services, to a foreign terrorist organization, to
wit: the Islamic State of Iraq and the Levant, knowing that the
organization was a designated terrorist organization, and that the
organization had engaged in and was engaging in terrorist activity and
terrorism.

FILED
HARRISBURG, PA
MAY 18 2016
VE

All in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2
(Attempting to Provide and Providing Material
Support and Resources to a Designated FTO)

From on or about July 2014 to on or about December 17, 2015, in Dauphin County, within the Middle District of Pennsylvania, the Defendant,

JALIL IBN AMEER AZIZ,

did provide and attempt to provide material support and resources, including personnel and services, to a foreign terrorist organization, to wit: the Islamic State of Iraq and the Levant, knowing that the organization was a designated terrorist organization, and that the organization had engaged in and was engaging in terrorist activity and terrorism.

All in violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

COUNT 3
(Solicitation to Commit a Crime of Violence)

From on or about July 2014 to on or about December 17, 2015, in Dauphin County, within the Middle District of Pennsylvania, the Defendant,

JALIL IBN AMEER AZIZ,

did with the intent that other persons engage in conduct constituting a felony that has as an element the use and attempted use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade such other persons to engage in such conduct, to wit: to kill and attempt to kill an officer and employee of the United States while such officer and employee was engaged in and on account of the performance of official duties; that is certain members of the United States uniformed services, in violation of Title 18, United States Code, Section 1114, and to knowingly assault and batter certain United States servicemen on account of the military service of the servicemen and status of the individuals as United States servicemen and status of the individuals

as United States servicemen, in violation of Title 18, United States Code, Section 1389(a).

All in violation of Title 18, United States Code, Sections 373 and 2.

COUNT 4

(Transmitting a Communication Containing a Threat to Injure)

From on or about July 2014 to on or about December 17, 2015, in Dauphin County, within the Middle District of Pennsylvania, the Defendant,

JALIL IBN AMEER AZIZ,


knowingly and willfully did transmit in interstate and foreign commerce, that is, by means of Twitter, which is an Internet-based electronic communications service, a communication providing the names, addresses, photographs, and branches of the military of approximately one hundred United States servicemen to the followers, and any viewers, of the defendant's Twitter account, and the communication contained threats to injure the approximately one hundred United States servicemen, including, among others, "[K]ill them in their own lands, behead them in their own homes, stab them to

death as they walk their streets thinking that they are safe” and
“Identities of Military personnel that bombed Muslims. Find them, Kill
them!”

All in violation of Title 18, United States Code, Sections 875(c)
and 2.

PETER J. SMITH
UNITED STATES ATTORNEY

A TRUE BILL


Daryl F. Bloom
Assistant United States Attorney


FOREPERSON

5/18/2016
DATE